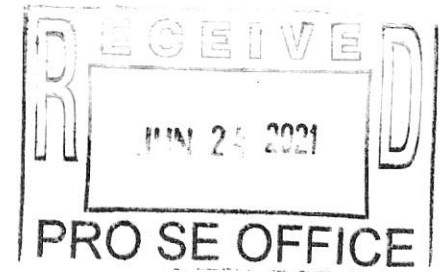


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

-----X
ANNETTE SANDERSON
JUSTICE BEY-ALLAH



CV 21-2498

*Rec in dkt 6/25/21 rg

-against-

AMENDED COMPLAINT

HSBC BANK USA
WELLS FARGO
AYDIN BK HOLDING INC
-----X

Plaintiffs for their amended complaint against the defendants, complains as follows.

1. Plaintiff Sanderson is a resident of the County of Kings in the State of New York
2. Plaintiff Bey-Allah is a resident of the County of Kings in the State of New York
3. Plaintiff s has no knowledge or information that would be sufficient to determine whether defendant HSBC is a domestic corporation authorized to do business in the State of New York.
4. Plaintiff s has no knowledge or information that would that be sufficient to determine whether defendant Wells Fargo is a domestic corporation authorized to do business in the State of New York.
5. Plaintiff s has no knowledge or information that would that be sufficient to determine whether defendant Aydin BK holding inc. is a domestic corporation authorized to do business in the State of New York.
6. Plaintiff's are in a common law relationship

7. Plaintiff's by and through personal acts contend that they are the legal owners of the premises known as 318 E 16th St, Brooklyn, New York 11226
8. By and through their acts and or omissions each of the defendants did hold a mortgage upon the premises owned by the plaintiff's
9. By and through their acts and or omissions each of the defendants were without legal or moral authority by the plaintiff's to have legal right for possession of legal debt or legal tender to possess said mortgage
10. By and through their acts and omissions each of the defendants covertly did conspire and or an act of collusion did foreclose upon the premises owned by the plaintiff's
11. By and through their acts and or omissions the defendants are in privity
12. AS FOR A CAUSE OF ACTION
13. Plaintiff repeats and realleges each and every statement in paragraphs 1 through 12 as though it was fully set-forth hereat.
14. By and through their acts and or omissions each of the defendants were without legal or moral authority by the plaintiffs to have legal right for possession of legal debt or legal tender to possess said mortgage
15. By and through their acts and omissions each of the defendants covertly did conspire and or an act of collusion did foreclose upon the premises owned by the plaintiff's
16. Defendants knew or should have known that their acts and or omissions would constitute collusion
17. AS FOR A CAUSE OF ACTION
18. Plaintiff repeats and realleges each and every statement in paragraphs 1 through 17 as though fully set forth hereat.

19. By and through their acts and or omissions each of the defendants were without legal or moral authority by the plaintiff's to have legal right for possession of legal debt or legal tender to posses said mortgage
20. By and through their acts and omissions each of the defendants covertly did conspire and or an act of collusion did foreclose upon the premises owned by the plaintiff's
21. Defendants knew or should have known that their acts and or omissions would constitute collusion and stress and anxiety
22. Demands a jury trial
23. Plaintiff seeks Ten (10,000,000.00) million dollars


Annette Sanderson


Justice Bey-Allah